



Region 2 Enforcement & Compliance Assurance Division
Air Compliance Branch
CAA Inspection Report

Inspection Date: 6/13/2023
Facility Name: Yacht Haven Grande
Facility Address: 5304 Yacht Grande, Suite 100, Charlotte Amalie, VI 00802
ICIS-Air ID #: VI0007800500105
Facility Contact: Phil Blake, Marina General Manager, 954-960-3973, pblake@igymarinas.com
EPA Lead Inspector: Richard Kan
EPA Asst. Inspector: Gloria Diaz-Galarza
State Inspector(s): N/A
Other Inspector(s): N/A

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Pertinent Regulatory Requirements

- VI-DPNR Terminal Facility License No.: TFL-STT-006, Expires 12/31/2020
- VIDPNR Air Pollution Control Minor Source Permit, expired 12/20/2013
- VIDPNR TV Permit Application, submitted 6/14/2016
- Draft TV Permit Number: STT-TV-007-19, not yet issued
- Virgin Islands Rules & Regulations (VIR&R): Title 12, Chapter 9, Sections 204 & 206

40 C.F.R. Part 63, Subpart ZZZZ, 63.6640(f) - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

- Applies to the 2 emergency generators since manufactured prior to 4/1/2006. Manufacture date is 7/26/2005

40 C.F.R. Part 60, Subpart EEEE – Standards of Performance for Other Solid Waste Incinerators

- Applies to new unit Other Solid Waste Incinerator since constructed after 12/9/2004. Constructed in 2005

Summary of Observations

At around 9:00 a.m., EPA inspectors Diaz-Galarza and Kan arrived at Yacht Haven Grande (YHG) marina and met with Mr. Charlie Irons, General Manager of Real Estate. We were informed that Mr. Phil Blake, Marina General Manager, was unable to attend the inspection. We presented our credentials and explained that the purpose of EPA's visit is with respect to the Clean Air Act and its pertinent regulations. For Yacht Haven Grande marina, the focus would be on the facility's incinerator and emergency generators.

We held an opening conference with Mr. Irons where he provided a brief background on the facility. YHG is a 24/7 46-slip marina that caters to all sizes of yachts and was opened for business around 2006-2007. The property is divided into two sections, the landside which is managed by Mr. Irons, and the marina side which is managed by Mr. Blake. There are 30 staff on site and that number expands to around 40 in season. November through April is the normal season. The extended season goes to June/July. July through November is usually the off season.

The marina's single incinerator and 2 identical generators are part of the land side of the facility. All incineration needs Dockmaster Earl Jones' approval. Among the engineering staff, there is 1 Chief Engineer (Manny Carneiro) and 3 Staff Engineers who work from 7a.m. – 4p.m. and then are on call. The incinerator and the East generator are both housed in the 'East Generator Building.' Inspectors were informed that the incinerator's purpose is for burning international trash which is composed of 98% agriculture/food and 1% files/papers.

Of the facility's two identical emergency generators, the East generator remains dormant and is turned on periodically. The West generator, located in the 'Main Generator Building,' is the main emergency unit that is activated when VIWAPA's grid power goes offline. The mechanical rooms are supposed to be under lock and key. VIWAPA is YHG's primary water and power authority but occasionally VIWAPA gives YHG a 30 min/ 1 hour advanced notice that the facility will need to start and stay on generator for a few hours. This type of demand response occurs around once or twice every other month.

There are also 4 underground storage tanks for diesel fuel for ships. Mr. Irons also explained that there have been no updates to YHG's permit status since EPA's last visit and is seeking guidance on the next steps.

At around 10:00 a.m., we conducted a walkthrough of the facility starting at the East Generator Building and observed the incinerator. The multi-chamber incinerator is manufactured by American Incinerator Corporation, Model AI180, S/N 042706577. Inspectors were informed that the unit runs on propane and is operated 2 to 3 times per week. It requires a 15-minute startup to reach the 1850 F setpoint in the combustion chamber (pollution control chamber). The primary chamber with the trash compartment has a setpoint of 1400 F. The cremation time for a full chamber is about 9 hours. For a partially full chamber, the burn time is around 4-5 hours. For trash from a large ship, the burn time of 9 hours is usually needed. Trash collection and a burn log estimates approximate weight of each burn since the facility does not use a scale. No other parameters or opacity are regularly monitored. When a burn is completed, the ash is binned and sent to landfill in bags.

The East Generator was observed to be a 1500 kW Caterpillar Model 3512 with a manufacture year of 2005, S/N ACG00253, and about 629 run hours on its hour meter. It was explained that this generator is started around once per month and has a monthly checklist. The manufacturer, Caterpillar, supposedly disabled the engine earlier in the year due to a sensor not working properly. At around 10:30 a.m., we observed the West Generator which is also a 1500 kW Caterpillar Model 3512 with a manufacture year of 2005, S/N ACG00252, and about 1959 run hours on its hour meter.

At the conclusion of the walkthrough, we proceeded to review documents back at YHG's office. The following records were reviewed on site:

1. Garbage Collection and Burn Log - observed that weights are approximated.

2. Adena Environmental waste contractor disposal records - for used oil, motor oil
3. YHG Restricted Garbage Training Log – 2020, 2021, 2022
4. Permit to Operate #STT-8-017-B-09, expired 11/13/2012
5. 12/21/2021 CBP Memo, Policy Change to Increase Regulated Garbage Hold Time (from 72 hrs to 120 hrs)

After reviewing available documents, inspectors communicated that unavailable records can be sent electronically. At the closing conference for the inspection, inspectors explained the need to log nonemergency hours of operation vs emergency hours of operation for the emergency generator logs.

In a follow-up email to Mr. Irons on July 3, 2023, EPA requested the following documentation to be sent electronically:

Operator Training and Qualifications

60.2905

c) please provide incinerator operator training course that includes elements in c1 to c3

60.2908

Please provide last 3 years documentation of this training refresher. Must cover at least the 5 topics in a through e

60.2910

- a) provide documentation of operating procedures covering 9 topics and maintain training records
- b) documented program for reviewing operating procedures with new incinerator operators
- c) list of OSWI unit operators with dates of initial and annual trainings

60.2911

b) provide records of periods when qualified operators were not accessible

Emission and Operating Limits

60.2915

Emission limitations must be met 60 days after OSWI unit reaches operating charge rate, but no later than 180 days after initial startup

60.2917

Please confirm whether there has been an EPA petition for specific operating limits, values from initial performance test and continuously monitored after
Performance test must be conducted only after petition is approved by EPA

Continuous Compliance

60.2932

- a) annual performance test must be completed
- b) CO must be continuously monitored
- c) EPA petitioned operating parameters must be continuously monitored as 3-hr rolling average

Monitoring

60.2939

a) please confirm whether Yacht Haven has a CEMS for CO and for O2

60.2940

a) Provide last 3 years of initial, quarterly, and annual evaluations of the CEMS that measure CO and O2

Recordkeeping and Reporting

60.2949

Provide last 3 years of the following records

- b)(1) incinerator unit charge dates, times, weights, and hourly charge rates
- b)(5) data for operating parameters used to determine compliance with operating limits
- b)(6) 1-hour average concentrations of CO emissions

b)(7) 12 hour rolling averages of CO and 3 hour rolling averages of continuously monitored operating parameters

b)(8) instances of control device bypasses

60.2955

Please provide last 3 years of annual reports

60.2956

Please provide 3 years of deviation reports if applicable

Lead Inspector's Name: Richard Kan

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Lead Inspector

Assisting Inspector's Name: Gloria Diaz-Galarza

GLORIA DIAZ X GALARZA	Digitally signed by GLORIA DIAZ-GALARZA Date: 2023.08.15 09:42:46 -04'00'
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Assisting Inspector

Supervisor's Name: Robert Buettner

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Supervisor